

**TIFFANY & BOSCO**  
P.A.

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Mark S. Bosco  
State Bar No. 010167  
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State Bar No. 014228  
Attorneys for Secured Creditor

10-19044

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE:

Carlos Burton and Carla Leticia Burton

Debtors.

U.S Bank National Association, as trustee for J.P.  
MORGAN Alternative Loan Trust 2006-S1

Secured Creditor,

vs.

Carlos Burton and Carla Leticia Burton, Debtors;  
Dianne C. Kerns, Trustee.

Respondents.

No. 4:10-bk-19913-JMM

Chapter 13

OBJECTION TO CHAPTER 13 PLAN

U.S Bank National Association, as trustee for J.P. MORGAN Alternative Loan Trust 2006-S1, a  
secured creditor, by its attorneys, TIFFANY & BOSCO, P.A., hereby objects to the proposed Chapter 13  
Plan filed by the Debtor for the following reasons:

1. The Chapter 13 Plan does not adequately provide for repayment of arrearages owed to U.S  
Bank National Association, as trustee for J.P. MORGAN Alternative Loan Trust 2006-S1, pursuant to

1 the proof of claim in the amount of \$11,657.96. Secured creditor requests that the arrearages as set forth  
2 in its Proof of Claim be paid through the Plan. A copy of Secured Creditor's Proof of Claim is attached  
3 hereto as Exhibit "A" and made a part hereof by this reference.

4 2. The Chapter 13 Plan filed with the Court does not provide to secured creditor repayment of  
5 its attorney fees incurred for bankruptcy and/or foreclosure proceedings. Secured creditor requests that the  
6 attorney fees as set forth in its Proof of Claim be paid through the Plan.

7 Secured Creditor will withdraw these objections when presented with a Stipulated Order  
8 Confirming Plan that provides for the arrearages, interest and fees as provided in the Proof of Claim and as  
9 stated above.

10 DATED this 3rd day of August, 2010.

11 Respectfully submitted,

12 TIFFANY & BOSCO, P.A.

13 BY /s/ MSB # 010167

14 Mark S. Bosco

15 Leonard J. McDonald

16 Attorneys for Secured Creditor

17 COPY of the foregoing mailed  
18 August 3, 2010 to:

19 Carlos Burton and Carla Leticia Burton  
20 5164 E. Circulo Las Cabanas  
21 Tucson, AZ 85711  
22 Debtors

23 Kathryn L. Johnson  
24 2 E. Congress St., Ste 900  
25 Tucson, AZ 85701  
26 Attorney for Debtors

Dianne C. Kerns  
7320 N. La Cholla, #154  
PMB413  
Tucson, AZ 85741  
Trustee

By: Julie Bush

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